

**Implementation Plan Figure C –
California Regional Water Quality Control Board Letter**



California Regional Water Quality Control Board

Santa Ana Region



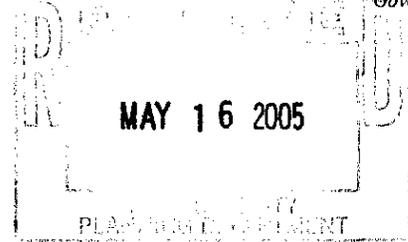
Alan C. Lloyd, Ph.D.
Agency Secretary

3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 – FAX (951) 781-6288 – TTY (951) 782-3221
<http://www.waterboards.ca.gov/santaana>

Arnold Schwarzenegger
Governor

May 13, 2005

Craig Aaron, Principal Planner
City of Riverside Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, CA 92522



REQUEST FOR AN INCORPORATED ITEM IN THE CITY OF RIVERSIDE GENERAL PLAN 2025 UPDATE

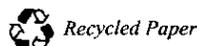
Dear Mr. Aaron:

Following our March 29, 2005 meeting with you and other City of Riverside planning staff, photographic maps of arroyos within City boundaries (maps) were copied for our use, along with a copy of City of Riverside Ordinance No. 6453, Riverside Municipal Code Title 17, Grading (Grading Ordinance). The maps reflect Exhibits A-F of Grading Ordinance Section 17.08.011 (2003 amendment). We have reviewed these documents, and request that the following be incorporated into the Riverside General Plan 2025 Update (GP Update):

We request that a map be added to the GP Update, similar to Figure OS-3 of the General Plan Open Space and Conservation Element, with the delineations within arroyos and other drainages that we have marked (with orange) on the enclosed maps. These delineations represent areas within drainage courses where we believe that water quality standards (water-quality objectives and beneficial uses¹) of waters of the State, and possibly waters of the U.S., would be impacted or lost by any projects involving dredge and fill activities. The indicated delineations are outside of, and therefore augment, the areas already delineated and protected by the Grading Ordinance. First and foremost, projects in the areas of these drainages delineated by both the Grading Ordinance and Regional Board staff must avoid direct or cumulative impacts to water quality standards. Where such avoidance is not possible, then impacts to water quality standards (in particular, loss of beneficial uses) must be suitably mitigated pursuant to Clean Water Act (CWA) Sections 404 and 401. For project sites containing drainages, early consultation with U.S. Army Corps of Engineers and Regional Board staff is strongly encouraged, so that any water quality regulatory requirements, such as Section 404 permits and Section 401 water quality certifications, can be properly considered prior to making final California Environmental Quality Act (CEQA) determinations. We request that text in one or more elements and sections of the GP Update, including the text discussing the map and water quality standards delineations proposed, reflect the discussion above.

¹ Beneficial uses for surface waters (and groundwater basins) are established and defined in the Water Quality Control Plan for the Santa Ana River Basin (Basin Plan). The beneficial uses most applicable to the City of Riverside's arroyos and their tributaries are Groundwater Recharge (GWR), Contact Recreation (REC1), Non-Contact Water Recreation (REC2), Warm Freshwater Habitat (WARM), Limited Warm Freshwater Habitat (LWRM), Preservation of Biological Habitats of Special Significance (BIOL), Wildlife Habitat (WILD), and Rare, Threatened, or Endangered Species (RARE) habitat. In particular, state waters supporting REC2 are defined as recreational activities, including aesthetic enjoyment, in proximity to water but where ingestion of water is not reasonably possible. The WILD beneficial use applies to waters that support wildlife habitats, including the preservation and enhancement of vegetation and prey species. WARM waters support warm water ecosystems that may include, but are not limited to, preservation and enhancement of aquatic habitats, vegetation, fish, and wildlife, including invertebrates.

California Environmental Protection Agency



We believe that the Grading Ordinance and several GP Update objectives substantially protect water quality beneficial uses for the Springbrook, Tequesquite, Alessandro, Prenda, Woodcrest, and Mockingbird Canyon Arroyos, in conformance with the Basin Plan. The provisions of the Grading Ordinance also apply to U.S. Geological Survey-identified blue-line streams, other significant arroyos, and lands in the RC-Residential Conservation Zone. We understand that the Grading Ordinance provides for very minimal construction disturbance in, and in most cases avoidance of, arroyos with average natural slopes of 10% or greater. However, we note that arroyo areas and tributaries with less than 10% average natural slope are not covered by the Grading Ordinance and are therefore more vulnerable to beneficial use impacts that may be caused by land use decisions. Development that affects these areas should also be subject to ordinance provisions that protect applicable beneficial uses. Following recent field confirmation by Regional Board staff, we have marked for consideration for protection those flatter drainages that appear to currently support the WILD, WARM, REC2, and perhaps GWR water quality beneficial uses. Our delineations also include segments of drainages that Regional Board staff believes have potential for restoration of impaired beneficial uses. Notably, in eastern Riverside we consider the converging arroyos between Via Vista Drive and Century Avenue worthy of protection, as well as numerous drainages associated with the Alessandro and Prenda Arroyos in the Overlook Parkway area; the distal end of the Woodcrest Arroyo; and the drainage that flows westerly across the U.C. Riverside Citrus Experimental Station, Ottawa Avenue, and a park toward Martin Luther King Boulevard. We intend to similarly inform staff of the Riverside County Planning Department about adjacent or continuing drainages outside City limits.

While we recognize that the arroyo protection features of the Grading Ordinance tend to focus on the eastern and southern parts of the city, our review of the orthophotos provided by City staff included scrutiny of areas throughout the city where WILD, WARM, and REC2 beneficial uses appear to exist. Again, ordinance provisions that protect applicable beneficial uses should be extended to recognized drainages outside of the arroyos delineated in the Grading Ordinance. For example, development in the entire drainage tributary to Fairmount Park, and the drainage exiting the Park to the Santa Ana River, should be subject to these protective provisions, as should the drainages tributary to the Santa Ana River, respectively, at the end of Tequesquite Avenue and parallel to Van Buren Boulevard. Similarly, in eastern Riverside, the large network of well-vegetated drainages in the open space between Alessandro Boulevard and Central Avenue should have beneficial uses protected by the Ordinance.

We hope this information will be useful to City staff as they consider future projects, and that it can be incorporated into the General Plan. During the March 29 meeting, City staff suggested that it would be useful to discuss these maps at a subsequent meeting. We concur, and look forward to reviewing and going over the maps with you and/or your staff at a convenient time.

If you have any questions, please contact me at (951) 782-3234, or Glenn Robertson of my staff at (951) 782-3259.

Sincerely,



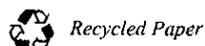
Mark G. Adelson, Chief
Regional Planning Programs Section

Enclosure: All Arroyo Maps (hand delivered to Patricia of Mr. Aaron's staff)

cc: Patti Nahill, City of Riverside Planning Department

Q: Planning/Groberts/Letters/401- City of Riverside Maps- 401 Response Letter-MGA-Final

California Environmental Protection Agency



City of Riverside Arroyos

Legend



City Limits



Arroyos

Arroyos 50 Ft Buffers

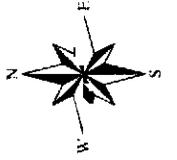
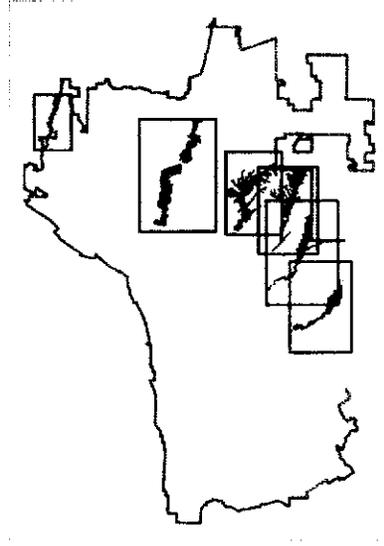
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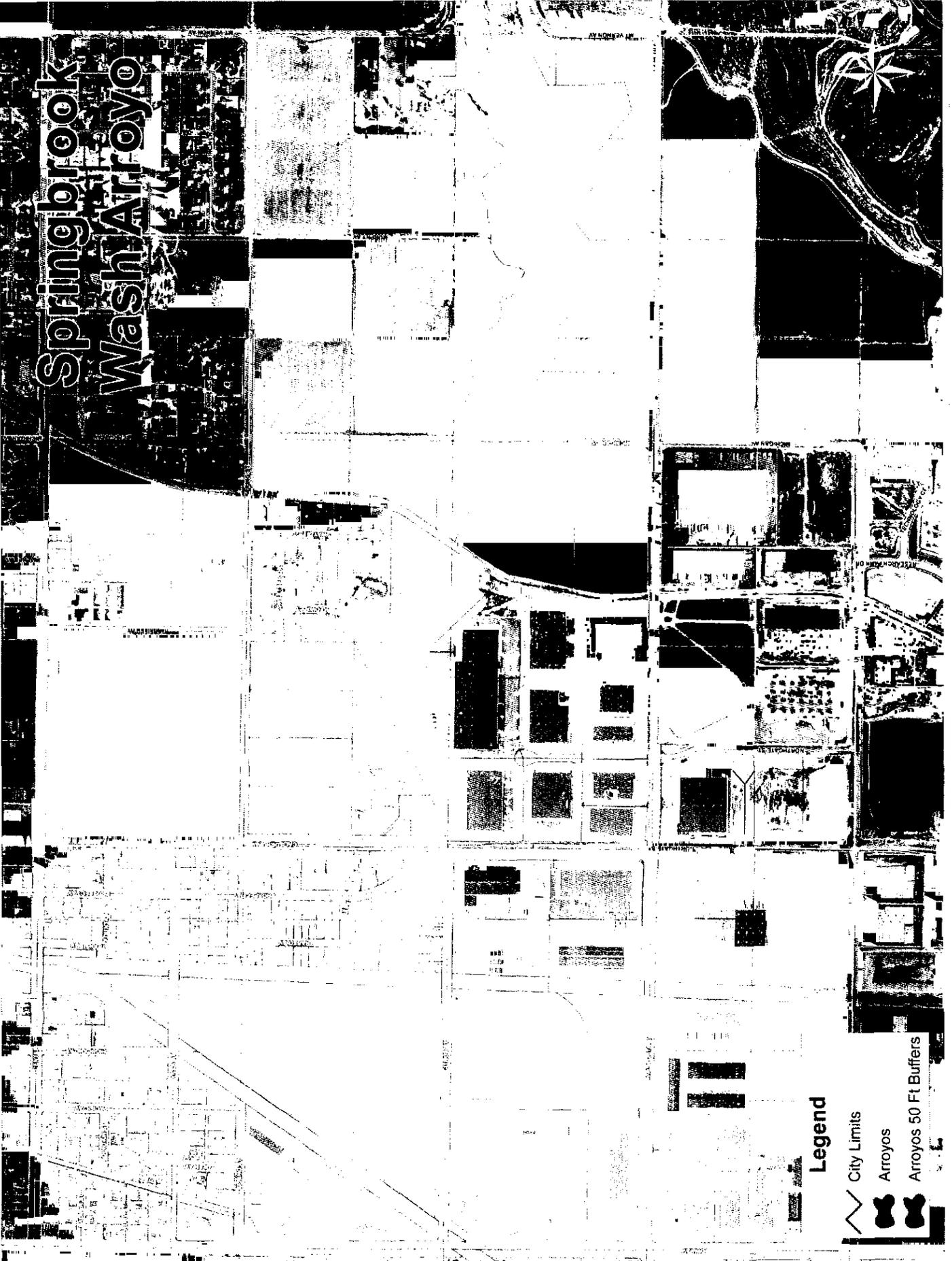
City of Riverside Arroyos

Legend

- City Limits
- Arroyos
- Arroyos 50 Ft Buffers



Springbrook Wash Arroyo



Legend

-  City Limits
-  Arroyos
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Tequesquite Arroyo



Legend

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Alessandro Arroyo

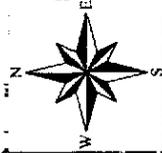


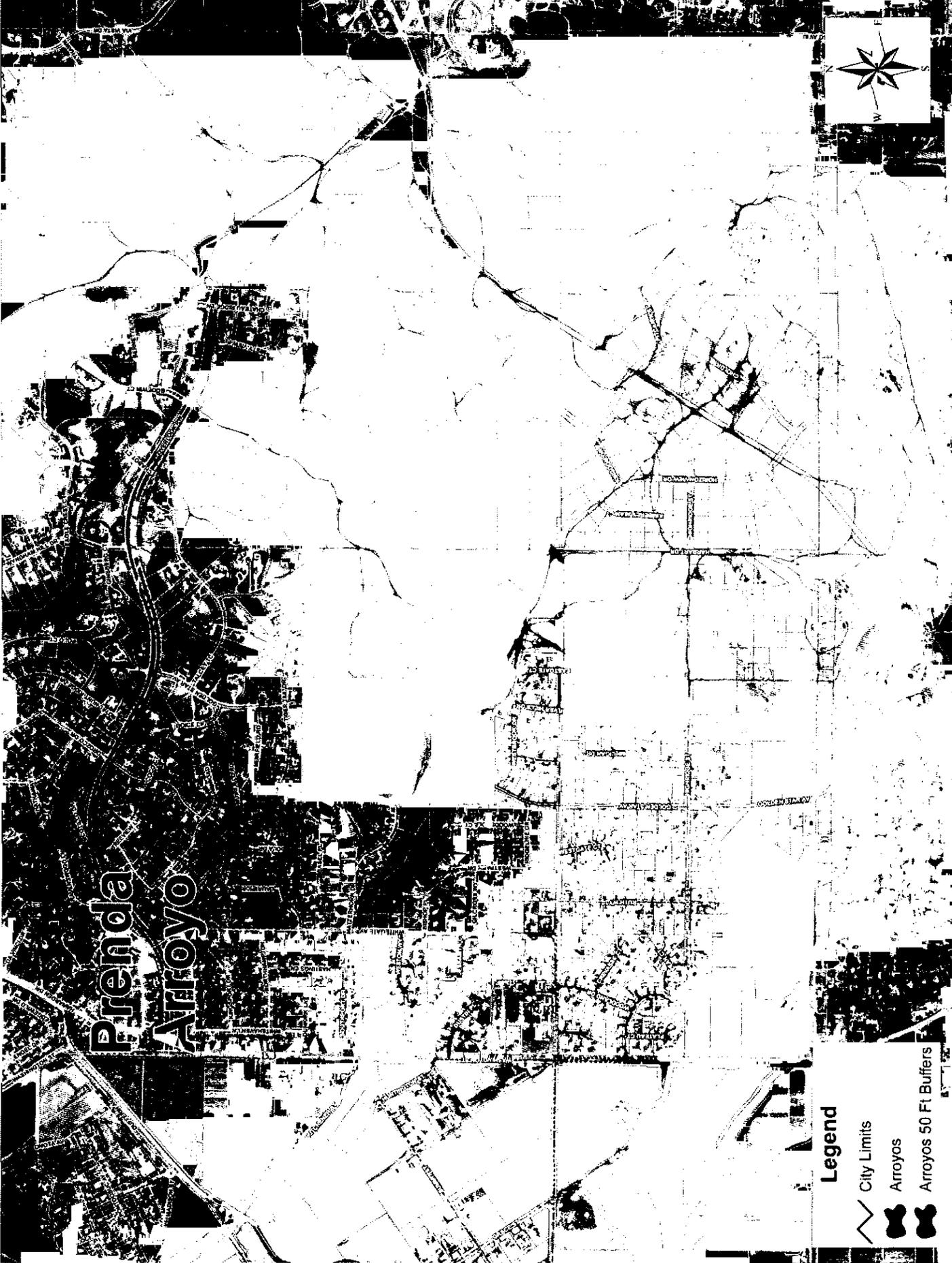
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City Limits

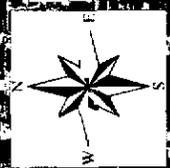
Arroyos

Arroyos 50 Ft Buffers





**Prenda
Arroyo**



Legend

-  City Limits
-  Arroyos
-  Arroyos 50 Ft Buffers

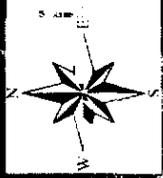


Woodcrest
Arroyo

Legend

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Mockingbird Canyon Arroyo



Legend

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